

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

SUSAN LANG,
Plaintiff,

v.

LANDMARK SCHOOL, INC.,
Defendant.

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C.A. NO. 04-11867-NG


JOINT MOTION TO EXTEND DISCOVERY DEADLINE BY 60 DAYS

The parties jointly move this Court to extend the discovery deadline by sixty (60) days, from April 16, 2005, to June 15, 2005, for the following reasons:

1. This action stems from Plaintiff's former ongoing employment relationship with the Defendant. Plaintiff claims that the Defendants discriminated against her due to her disability.
2. The parties agreed to a very aggressive discovery schedule which they have found difficult to accommodate. The parties have done some paper discovery and have taken some depositions and, at this point, deem it wise to explore mediation as a means to resolution. If mediation fails, then remaining discovery should be completed by June 15, 2005.
3. Discovery has proven difficult to complete as the relevant fact pattern spans nearly 10 years and involves numerous documents and witnesses. Also, the Holidays and unrelated litigation events have delayed discovery.


WHEREFORE, the parties jointly request that this Motion be allowed and that discovery be extended to June 15, 2005.

The Plaintiff,
SUSAN LANG,
By her attorney,
Law Office of Mitchell J. Notis



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The Defendant,
LANDMARK SCHOOL, INC.,
By its attorneys,
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Dated: March 29, 2005

I hereby certify that a copy of the
above document was served upon (each
party appearing pro se and) the attorney
of record for each (other) party by mail
(by hand) on 3-29-05 at for